

#	Comment	Category	Answer
Acronym List			
1	Acronym List: No changes, except if this document is intended for wider distribution than just to the SLISA callers, it might be helpful if the Description could include which department of the Federal Government each of the Federal acronyms belongs to (CFO, FP, NPC, SFA, etc.).	Acronym List	The Acronym list was updated with the requested ED departments.
Action Item			
2	The "action items list" did not include the issue on allowing more than 2 user IDs for lenders.	Action Item	ED-SFA has purchased a limited number of licenses to allow users to connect to LaRS. We estimated an average of 2 user IDs per Lender, which should be sufficient for most Lenders. After the initial distribution of user IDs, we will consider requests for additional User IDs on a case-by-case basis provided we have additional IDs to distribute.
Bank Account Information			
3	The servicers may need to update the bank account information for their clients. There must be a process to allow the servicers to do this.	Bank Account Information	Bank Account and Routing number updates will be made via the SFA Help Desk. A policy addressing this issue is being developed and will be disseminated to the community.
Crosswalk			
4	Crosswalk: On page 5, the 799 section 'Fee Due (F)' is displayed under the 'File Transfer Record' column as RECORD_3-Fee Due. However, on the LaRS file Transfer process and record layout discussion document there is no 'Fee Due' listed on page 10 or 11.	Crosswalk	Fee Due has been removed from Part 1 of LaRS. The Crosswalk incorrectly stated that the field still existed. The Crosswalk has been updated accordingly.
5	I would like to see something on adjustments to prior quarters for parts II, III & IV and Crosswalk. the materials are not clear to me. Are negative numbers allowed? The LaRS File Transfer portion, Special Allowance category on page 18 does not list the "XA", "XB" etc. loan categories.	Crosswalk	Adjustments within parts I (Loan Origination), II (Interest Benefits) and III (Special Allowance) are designated by using Fee Codes, FD (Decrease), FI (Increase), LI (Increase) and LD (Decrease) and billing codes BI (Increase) and BD (Decrease). Adjustments are not made within Part IV (Loan Activity). This LaRS adjustment process is consistent with the adjustment process used within the current 799 process. Negative numbers are not allowed. The missing Special Allowance Codes were added to the document.
6	Crosswalk: Describe the relationship and accessibility of lender and servicer access to data submitted.	Crosswalk	Lenders and Servicers will be able to view in Read Only format data all invoice data that has been submitted for their associated LIDs.
7	799-LAP/LaRS/File Transfer Crosswalk discussion draft, page 7, for Part IV is confusing in the comments note to the 799 and LaRS screen concerning the column letters A through I. It looks like there may be an error in the comments section.	Crosswalk	The Cross Walk document was corrected.
File Transfer			
8		File Transfer	In order to facilitate cross-part/cross-record edits, the order of the parts/records in the file were changed. Also the "record" number now matches the "part" number.
9	File Transfer Process: Part II(III) does not appear to address the issue of the adjustments on Part III as it relates to calculation methods. This line on Part III only provides an interest amount (no Average Principal Balance) for ED to calculate based on the lenders choice of calculation method. Request clarification for what rule will be utilized for BD/BI on Part III.	File Transfer	The "Additional Information" column for the "Interest Amount" field was updated to address the issue regarding adjustments for prior periods. Additional information regarding Adjustments is contained within the LaRS Interest Calculation Scenarios document in the "Roles and Responsibilities" section.
10	File Transfer Process: Part V states that if loan type is PL (Plus), CL (Cons) or LS (SLS) that you must enter 12 zeros in the Loans in School and Grace. Presently, our system reports Plus loans in this status until fully disbursed and ED has allowed the data. Please clarify if servicers/lenders have to reclassify this data to another line with the new electronic version.	File Transfer	For loans in Schools and Grace: Federal Plus, Federal SLS and Federal Consolidation loan data was not allowed as part of 799 processing and will not be allowed as part of LaRS processing. In the file layout twelve zeros should entered for each of these fields.
11	In the Layout Draft (pg 6 of the most recent layout document. Appendix A does not specify) what is included in the 'Activity' attribute at position 14?	File Transfer	There are 4 'Activity' related fields in the record layout. These fields identify whether or not the LID is reporting any overall 'Activity' or any 'Activity' related to one of the three other 'Activity' fields. Depending upon the values in these 4 fields, the program will look for the existence of records to support the activity. For example, if the field 'Origination or Activity/Adjustment' contains a value of 'N' and the program finds the existence of a 'Part I' this would cause the invoice to be rejected. A definition for each of the 4 'Activity' fields was added to the document in the "Additional Information" column.
12	If we submit our Electronic File Transfer as one large attachment and one LID within that file rejected is the entire file considered one invoice and sent back? or will the rest of file be accepted and the LIDS be individual invoices?	File Transfer	When problems are found processing the invoice for a single LID, only that LID's invoice will be rejected. The invoices for the other LIDs in the file will be processed. If a problem at the 'file level' is detected (e.g. the number of records in the file does not match the count of records in the file's trailer record, the Sender ID in the header record is not a valid servicer ID or Lender ID, etc.) the file itself will be rejected and no invoices within the file will be processed.

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13	LaRS File Transfer Process and Record Layout: On both page 17 and 18, the "Loan Interest Rate" "Interest Rate" information does not include a description of fixed rate loans. These should be reported with seven digits at their actual rate for Interest Subsidy, and applicable rate for Special Allowance. As worded, the description of "VAR" seems to include fixed rates by stating "For all other interest rates". It should say "For all other variable interest rates". The combination of these two suggestions should alleviate any potential confusion.	File Transfer	The suggested change to the text was incorporated. In addition, examples for actual interest rates were included.
14	LaRS File Transfer Process and Record Layout: On page 18, under "Special Allowance Category", I want to bring to your attention again that the "Half-SAP / X" codes are not listed. I refrain from using "tax-exempt" to describe the "X" codes because, as of 10-1-1993, there are tax-exempt bond issues that do not receive "Half-SAP".	File Transfer	The missing Special Allowance Codes were added to the document.
15	LaRS File Transfer Process and Record Layout: Also under "Special Allowance Category" categories SE and SG (as well as their corresponding "X" codes) should refer to consolidation loans made based on applications received by the lender "prior" for SE, and "on/after" for SG.	File Transfer	The edit rules for the identified Special Allowance Codes were updated.
16	File Transfer Layout: The explanation for Interest Rate in Part II (page 11) states that the rate will be verified against Treasury T-bill Rate. The comment only applies to variable rate loans. Please modify the explanation to accommodate fixed rate loans (i.e. Consolidation loans).	File Transfer	The comment for 'VAR' was updated to apply only to variable rate loans. The references to Treasury T-Bill Rate was removed and replaced with the interest rate ranges.
17	File Transfer Layout: The explanation for Interest Amount in Part II (page 12) states that we must report a whole dollar amount. Based on the 1/7/01 call, the amount should be reported in dollars and cents	File Transfer	The Interest Amount in Part II must be the exact dollar amount to the penny. This change was applied to the document.
18	File Transfer Appendix A: The explanation for Loan Interest Rate in Part I (page 17) states that VAR is to be used for 'all other interest rates'. I think it should say 'for all other <i>variable</i> rates'. Also, the list should be expanded to allow for fixed rates (i.e. Consolidation loans).	File Transfer	The comment for 'VAR' was updated to apply only to variable rate loans.
19	File Transfer Appendix A: The list of allowable Special Allowance Categories (page 18) is missing the tax-exempt codes.	File Transfer	The missing Special Allowance Codes were added to the document.
20	On the LARS File Transfer Process and Record Layout page 17 Loan Interest Rate, should the flat rates be read 0000008 for 8%?	File Transfer	For an interest rate of 8% the file layout should be 0008000.
21	Appendix A for Record 3 did not list actual rates among the valid interest rates. These are viable because of the Consolidated loans.	File Transfer	Interest rate ranges were added
22	In Record 4, the sample for reporting interest rates used only 6 digits. Should it be the same as the sample in Record 5?	File Transfer	The example for Part II was updated to use 7 digits.
23	Record 4 mentions testing the interest rate against the T-Bill. This doesn't seem possible given that some rates are fixed or are reduced based on marketing.	File Transfer	The comment for 'VAR' was updated to apply only to variable rate loans. The references to Treasury T-Bill Rate was removed and replaced with the interest rate ranges.
24	None of the special allowance codes for loans purchased with tax exempt funds were listed.	File Transfer	The missing Special Allowance Codes were added to the document.
25	Roadmap: Update the File Transfer flows to include the following: Pg. 16 – "If an invoice within the File Transfer is rejected, Lenders/Serviceirs have the option to correct the invoice via the web." It seems that correcting the invoice via the web should be limited to only those instances where the invoice is originally submitted through the web.	File Transfer	Submission Procedures: if a user elects to submit a file via the 'File Transfer (FT)' method, rejected files should be resubmitted using File Transfer. However, users of this method can still go to the FMS website to access relevant data, once that file has been 'successfully' submitted to FMS.
26	File Transfer Process: On many of the records, there is a filler field to carry the record length to 154. Please explain whether the lender/servicer submitting an electronic 799 needs to add filler spaces, or whether it can we simply put a carriage return after the valid data. For example, on the HEADER record, can a carriage return be put in position 14 or is it necessary to insert 141 spaces?	File Transfer	The preferred approach is to fill the 'filler' field with spaces instead of using a carriage return.
27	the Quarter code and Year is missing from the first header record.	File Transfer	The Quarter Code and Year are not required in the HEADER record layout. These codes are included on the RECORD_0 layout as this is the layout that identifies a specific invoice.
28	File Transfer Process: Please define data validation review edits	File Transfer	The table in section 2.3 LaRS Data File Layout was updated to include edit rules. The record layouts were re-ordered to accommodate cross-record edit checking.
29	File Transfer Process: Define how the status of the file transfer may be monitored by the servicer / lender	File Transfer	The sender of a file using the file transfer approach will receive a notice (email) (See Notice number 14 and 17) indicating whether or not the file itself was accepted or rejected.
30	File Transfer Process: Once the file transfer has been accepted, please state when payment will be received	File Transfer	SFA anticipates an average of 3 - 10 days from receipt of a valid invoice to transmission of payment for invoices filed electronically. Invoices submitted using the paper-based process may take up to 30 days.
31	File Transfer Process: Define the time frame established for re-submission of a rejected invoice	File Transfer	The Lender/Servicer may re-submit a rejected invoice at any time. The invoice may be contained within the next file submission from the Lender/Servicer or in another file submission weeks or months later. There is no defined time frame.

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32	File Transfer Process: If you answer N in "Record 0" in Header Layout for any activity (not the actual Activity line) please clarify if you have to populate any data in the part for which you answered N. For example, if an N was put in the Data Element "Origination or Activity Adjustments" Please clarify if the lender still has to complete a Part I(II) with zeros to indicate there is no billing. The current process requires you to complete a blank part for those with no data.	File Transfer	When the value of one of the specific 'Activity' fields contains an 'N', then the sender should not include a record in the file for the corresponding Part. For example: if the sender places an 'N' in the 'Origination or Activity/Adjustment' field, then there should not be any Part I records for this invoice. If there are Part I records in the file for this invoice, the invoice will be rejected.
33	File Transfer Process: Part II(III) makes the statement that the interest rate will be checked against the T-bill Rate. Please address the issue of lenders who enter interest rates that are lower than the T-bill Rate, since they are inputting the borrower benefit rate. Define any related reject conditions.	File Transfer	The comment for 'VAR' was updated to apply only to variable rate loans. The references to Treasury T-Bill Rate was removed and replaced with the interest rate ranges.
34	File Transfer Process: Part III(IV) tax- exempt sap codes are not listed in the Layout Document. Please clarify why they are not being included and if they should be reported on Part III(IV).	File Transfer	The missing Special Allowance Codes were added to the document.
35	File Transfer Process: Part II/III(III/IV) layout appears to indicate that if the ending principal balance is zero for a BC you would enter 12 zeros. Please confirm this assumption.	File Transfer	The assumption is correct.
36	File Transfer Process: Part IV & V(V/VI) - Please clarify if ED automatically calculates the ending balances for each column (loan type) on these Parts. The LaRS form does not have a field for this data.	File Transfer	ED automatically calculates the ending principal balances for each loan type for Parts IV and V.
37	File Transfer Process: Part IV & V info does not specifically address how to input lines with the O data except it does mention on Part IV(V) how to handle if the Loan Principal Disbursed is TS to input 12 zero's. Please define the input process for all other lines on Part IV/V that are zero.	File Transfer	If the value for one of the amount fields in Parts IV or V is zero or not applicable, then enter 12 zeroes into the field. The document was updated with this information.
38	File Transfer Process: Part IV does not explain if negative numbers can be entered on the form. Please clarify if the new form handle negatives. The existing edits cannot and the lender is advised to reclassify negative lines from 3 to 6 in a self chosen line 7-10. Negative lines in 7-10 to a line in 3-6. Please clarify if this rule still applies and if the new form takes negative numbers.	File Transfer	The rule preventing negative numbers from being entered into the 799 applies to the LaRS application. Absolute values must be entered into the LaRS application. The following Billing Codes of BD, LD or FD indicate that the value is a negative amount.
39	File Transfer Process: Our interpretation of the term 'unique key combination' is that the unique key is the unique combination of LID, Servicer ID, and LARS submission year and quarter. As a servicer, we could possibly file two (or more) LARS within the same calendar year/quarter for the same LID. Provided that the LARS were actually for different year/quarters, this would be allowed (key for one LARS would be LID 812345 / Servicer 700057 / Year 2002 / Quarter 1; key for the other LARS would be LID 812345 / Servicer 700057 / Year 2002 / Quarter 2). However it would not be allowed if both LARS were for the same Lender, Servicer, Year, and Quarter. Is this interpretation correct?	File Transfer	The interpretation is correct.
40	File Transfer Process: Is the sequence number that is part of the file name on the file transfer header also part of the key? If the sequence number is not part of the key, how would corrections be submitted so they don't error off?	File Transfer	The sequence number is part of the name of the file. The sender can not submit another file with the same name as a previously submitted file. For each invoice within the file, the sequence number from the file name is not part of the unique identifier. If an invoice in a file is rejected, the sender will receive a notice identifying the incorrect items. The rejected invoice will not be stored on the system. The sender may correct the invoice and then include that invoice in a future file submission.
41	File Transfer Process: Is there a way to prevent accidental re-submissions from overlaying invoices that have already been approved?	File Transfer	The invoice processing program checks newly submitted data against previously approved invoices. If a duplicate submission is received the invoice will be rejected and a reject notification will be sent to the submitter.
42	File Transfer Process: In the Note on page 3, as well as throughout the File Transfer document, our interpretation of the term "Lender" is that it refers to a specific LID. In other documents, it appears that a single Lender may have multiple LIDs, but here, it appears that there is a one-for-one correlation between 'Lender' and 'LID'. Is this correct? If not, this would be a very big change from the current practice of submitting separate 799s for each LID, regardless of how many LIDs a lender might have.	File Transfer	The Note has been clarified to define that only one invoice per quarter may be submitted for a unique combination of Servicer ID (if applicable), LID, quarter, and year.
43	File Transfer Process: With regard to 2.2, the File Naming Convention, is there any reason why we could not have a sequential number for each LARS file sent during a quarter? Rather than starting each day's file submission with a name ending in '01', our current thought is that we would like to use the file number to keep track of the files sent throughout the quarter. For example, if three files sent the first day (file names ending '01', '02, and '03'), then the next file we'd send would end in '04', even though it was the first file sent another day.	File Transfer	The Sequence Number in the filename is to give the Lender/ Servicers the flexibility to be able to submit multiple LaRS in a quarter. The example approach is acceptable.
44	File Transfer Process: On page 5, section 2.2 File Naming Convention – The suggested format is "LaRS XXXXXDDMMYYYY99". Do you really need the lower case "a"? This seems unnecessarily picky and tricky. Would "LARS..." be acceptable in the file transfer header?	File Transfer	The lower case 'a' is not required. An upper case 'A' may be used.
45	File Transfer Process: (Records 1, 2, 3, 4, 5) Appendix A states that the Loan Type code for Unsub Stafford loans is "CU". Previously it has been shown as "SU". Is this a typo?	File Transfer	Yes, it is SU. CU has been changed to SU.
46	File Transfer Process: (Record 4) Interest Rate – How will this be verified against the Treasury T-Bill Rate? There are numerous fixed interest rates used for Consolidation loans, which are not dependent upon the Treasury T-Bill rate. In addition, many lenders take interest rate reductions as a marketing tactic to encourage borrowers to take out loans from them rather than other lenders, so these reduced rates cannot be verified against the T-Bill rate.	File Transfer	The interest rates will not be compared against the T-Bill rate.
47	File Transfer Process: (Record 4) Interest Amount – This number has been expressed as dollars and cents in the current 799, rather than in whole dollars. On previous versions of the file transfer layout, this is also true. In this version, it calls for whole dollar values to be given. Is this a typo? If not, please give an example of an amount that includes cents (i.e., 0000000789.23)	File Transfer	The Interest Amount in Part II (Record 4) must be the exact dollar amount to the penny. This change was applied to the document.
48	File Transfer Process: (Record 4) The "Additional Information" is much more helpful on this version than on previous versions of this document.	File Transfer	No Action Required.

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49	File Transfer Process: (Record 5) Appendix A does not show the Special Allowance Category codes for Tax Exempt loans. It is missing those codes that start with "X". These codes are needed.	File Transfer	The missing Special Allowance Codes were added to the document.
50	File Transfer Process: (Record 5) Our interpretation is that an interest rate of 7.0% fixed would be expressed as 0007000. Please show an example of a fixed decimal interest rate such as 7.0%.	File Transfer	For an interest rate of 7% the file layout should be 0007000.
51	File Transfer Process: We encourage ED to support an automated interface for file transmissions. The interface should provide a means to submit 799 reports that simplifies automated submission and processing. A recommendation would be to have the submission page directly accept an HTTPS string that contains UserID and password information, allowing bypass of the manual (human) login and file selection screens. Benefits would be: 1) Less time to process reports. 2) Simpler to program for an automated process. 3) Changes to other web pages used for the manual process would not affect the automated means.	File Transfer	SFA agreed to continue researching a more automated approach to the file transfer method. As agreed to in the Road Map community conference call on January 7, SFA will host conference calls with interested partners in an effort to find an acceptable approach to all parties.
52	File Transfer Process: If ED developed and made available to lenders and servicers its automated API, this would be an ideal and very efficient solution both now and long-term. Now, it would save each lender or servicer who wished to use sent LARS files to ED in an automated fashion from designing its own signon script. ED could do it once, for everyone. Later on, ED might wish to make some type of change to the signon screen's appearance or field names, and that change would cause the old automated signon to fail. If ED made corresponding changes in a new version of its standardized interface, it could redistribute the new version to lenders and servicers that transmit files via the automated API. Managing such a change would be a simple, straightforward process. On the other hand, if each lender or servicer built its own signon script, all those scripts would fail, unless each script had been modified to work with the changed data elements and the implementation of those changed scripts had been coordinated with ED.	File Transfer	SFA agreed to continue researching a more automated approach to the file transfer method. As agreed to in the Road Map community conference call on January 7, SFA will host conference calls with interested partners in an effort to find an acceptable approach to all parties.
53	File Transfer Process: Return Acknowledgements after Submission ED should provide positive confirmation to the sender when LARS files are transmitted electronically. This could be accomplished by either an email and/or by allowing users to perform an online search on previous transmissions. Since there is the possibility that a file that we have attached will get lost somewhere in the transmission before it reaches ED, we would very much like to get a positive acknowledgement that the file has been received.	File Transfer	An email confirmation will be sent to the Lender/ Servicer. See Notice Number 17 in the LaRS Notification Matrix document.
54	File Transfer Process: We are interested in knowing how the Oracle file transfer process will work. How will we be able to choose a file residing in a specific directory on our system using the "paperclip method" when we are signed onto ED's web site. Is a script returned to the local browser that is run to allow users to select local LARS files which are converted to an HTTPS stream to be sent to ED's LARS website. Please provide more details on how this will work.	File Transfer	Lenders/ Servicers will access the LaRS Secure Login Site. The Lender/ Servicer will log in to the LaRS application using their assigned User ID and Password. Upon entering LaRS, users will have the option of submitting LaRS via the Web or via FILE TRANSFER. The Lender/Servicer will select the FILE TRANSFER option, select the file that should be transferred from their local system, and submit the file via a secure site to a central FMS Server. The invoice-processing program will access the file for processing from this location.
55	File Transfer Process: We encourage ED to develop an automated interface API. If the automated interface is going to be supported, a description of the API (programming interface) would help us automate our process with less work.	File Transfer	SFA agreed to continue researching a more automated approach to the file transfer method. As agreed to in the Road Map community conference call on January 7, SFA will host conference calls with interested partners in an effort to find an acceptable approach to all parties.
56	On a prior call, I commented on the desire to have a summary e-mail sent to us on the acceptance or rejection of individual LID #s sent for a particular file. This could be in addition to the individual e-mails currently planned to be sent for each LID #. The summary could outline for each LID # in the file, whether it was accepted or rejected, the date accepted or rejected, specific error messages (if rejection) or payment information (if acceptance), etc. I have a strong desire to see such a document or e-mail summary sent to us on each file submitted.	File Transfer	Upon successful submission of a file, a report detailing the status of each invoice will be generated. The Submitter may have the option to log onto LaRS and view the report.
57	LaRS submission via the Web and via File Transfer both state that they will occur through an existing secure connection within the <i>Oracle Federal Financial product</i> . Do we need to have Oracle software installed to do submissions to the DOE? Is the DOE providing this software to us or do we have to purchase Oracle?	File Transfer	Additional software is not required at the Lender/Servicer location to support the LaRS submission via the web or the File Transfer approaches. When the user logs onto the LaRS system, a secure connection is automatically established.
58	Automated File Transmission Process: The current 799 reporting process Sallie Mae has with ED involves an automated process for transmitting 799 data significantly more efficient than contemplated with the new process under development. Sallie Mae and a number of large third party servicers have repeatedly indicated a desire to have the 799 files "swept" by ED rather than requiring a representative of the lender/servicer to log in to a secure data connection in order to manually transmit the 799 files. It is our understanding that there are also guarantors who have asked ED to develop a similar automated process for transmitting their Form 2000 reports.	File Transfer	SFA agreed to continue researching a more automated approach to the file transfer method. As agreed to in the Road Map community conference call on January 7, SFA will host conference calls with interested partners in an effort to find an acceptable approach to all parties.
59	File Transfer Process: Pg. 2 – should be updated to indicate ED's intention of eventually establishing an automated file transfer process	File Transfer	The document was updated to mention that a more automated approach to file transfer is under investigation.
60	Will the Electronic Transferred File be in an ASCII format?	File Transfer	The Oracle/FMS architecture requires that files be sent in an ASCII format.

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61	I would like to see something on adjustments to prior quarters for parts II, III & IV and Crosswalk. the materials are not clear to me.	File Transfer	Adjustments within parts I (Loan Origination), II (Interest Benefits) and III (Special Allowance) are designated by using Fee Codes, FD (Decrease), FI (Increase), LI (Increase) and LD (Decrease) and billing codes BI (Increase) and BD (Decrease). Adjustments are not made within Part IV (Loan Activity). This LaRS adjustment process is consistent with the adjustment process used within the current 799 process.
62	Are negative numbers allowed?	File Transfer	Negative numbers are not allowed.
63	The LaRS File Transfer portion, Special Allowance category on page 18 does not list the "XA", "XB" etc. loan categories.	File Transfer	The missing Special Allowance Codes were added to the document.
64	Are the new loan type codes used for both File Transfer and the Web base program?	File Transfer	The identified loan types codes will be used consistently within the LaRS application (e.g. for both file transfer and web based forms)
65	If I remember correctly, someone was going to determine if the layout needed to be adjusted for dollars and cents in the interest amount area.	File Transfer	The Interest Amount in Part II must be the exact dollar amount to the penny. This change was applied to the document.
66	hen, on page 10 of the same form we were unclear as to how the Create New LaRS "Activities" section would work as there wasn't an example in the discussion draft to view.	File Transfer	To create a 'New LaRS' form, the user will click on the 'Create New LaRS' button. By entering a 'Y' in the 'Activities' fields, the user will be able to enter information related to that part of the LaRS form. If the user enters an 'N' in the 'Activities' fields, the user will not be allowed to enter information related to that part of the LaRS form. Additional detail will be provided in the Help Text/User Guides to be issued later. From the file transfer perspective, when the value of one of the specific 'Activity' fields contains an 'N', then the sender should not include a record in the file for the corresponding part. For example: if the sender places an 'N' in the 'Origination or Activity/Adjustment' field, then there should not be any Part I records for this invoice. If there are Part I records in the file for this invoice, the invoice will be rejected.
67	The FileID, specifically the date and sequence number, needs to be included in all file transfer emails. This is necessary since we can store multiple 799s for any given lender and the FileID is how the transmitted 799s are tracked	File Transfer	Notifications referring to a specific invoice will reference the Servicer ID if applicable, Lender ID, quarter, and year. This is unique to the invoice, and will allow Lenders and Servicers to identify the invoice referenced. Notifications referencing the entire file transfer will include the file ID as specified in the file naming convention.
68	File Transfer Process: We have several questions with regard to the Note on page 3, which says: "Lender/Servicer will be allowed to submit only one invoice per quarter. Invoice duplication will be prevented based on unique key combination. Once the data is loaded, the Lender/Servicer may view the information using the respective LaRS screen."	File Transfer	The Note will be clarified to define that only one invoice per quarter may be submitted for a unique combination of Servicer ID (if applicable), LID, quarter, and year.
69	File Transfer Process: Is there a limit to the file size sent in a single transmission? If so, what is the limit?	File Transfer	The current file size limitation is bound by the HP-UX file size limitation of 2GB.
70	File Transfer Process: On page 11 of the document, the 'interest rate' data element has 'Additional Information' indicating "a value of 0.01725 will be represented as 001725" which is a length of 6. Should the value be 0001725 which would match the field length indicated of 7?	File Transfer	The sample for Part II was updated to use 7 digits.
71	File Transfer Process: Should the same 'interest rate' data element as in #1 above have 'Additional Information' indicating it is only to be supplied with a billing code of 'BC' and not 'B/BD'?	File Transfer	The file transfer document has been updated with the following text "This interest rate must be entered only if the Billing Code is BC".
72	File Transfer Process: In the Appendix on Page 17 and 19 for 'Interest Rate', 'VAR' is described as covering 'all other interest rates'. Should this be changed to 'all other variable interest rates' and should valid fixed rates be separately listed. It might be helpful to provide examples of how fixed rate loans are to be presented on the file (length of 7) as was done for FVAR7 (00FVAR7). For example, there are 8% fixed rate loans and consolidation loans can have different rates such as 8.875, 10, etc.	File Transfer	The comment for 'VAR' was updated to apply only to variable rate loans. The references to Treasury T-Bill Rate was removed and replaced with the interest rate ranges.
73	File Transfer Process: Exempt special allowance codes missing on Page 18.	File Transfer	The missing Special Allowance Codes were added to the document.
74	LARS File Transfer Process and Record Layout. Page 18 Special Allowance Category-does not include tax-exempt codes.	File Transfer	The missing Special Allowance Codes were added to the document.
75	File Transfer Process: For the same 'interest rate' data element as above in #1 & #2, what does the 'Additional Information' "this will be verified against Treasury T Bill Rate" mean? Does this mean only those annual variable rates effective 7/1 are accepted as valid rates in Part III?	File Transfer	The comment for 'VAR' was updated to apply only to variable rate loans. The references to Treasury T-Bill Rate was removed and replaced with the interest rate ranges.
76	Need to have a final listing of the edits to be used prior to the acceptance of the file for processing.	File Transfer	Edits that may cause a rejection of a file or an invoice have been added to the File Transfer document.
77	File Transfer Process: Part I(II) does not address specifically how to enter actual numbers for interest rates (example: A consolidations-fixed rate out to five decimals). The LaRS File Transfer Process and Record Layout only lists EVAR,CVAR,.....FVARX a	File Transfer	The document was updated to show examples when an actual interest rate is used. (ex. For an interest rate of 7% the file layout will be 0007000 and a decimal point will not be included in the field)
78	Need to better understand the benefit for filing electronically.	File Transfer	Electronic filing reduces data entry errors, reduced processing and payment time and provides a better audit trail of interest payment submissions (Reference the Background Summary of Road Map document).
79	How quickly will the lenders actually be paid?	File Transfer	Electronic submissions will be paid on average within 3 - 7 days of submission. Manual invoices will be paid within 30 days.
Funds Disbursement			
80	Identify net, remittance, and any other categories of liability outside of those two – and include examples.	Funds Disbursement	Liabilities include but are not limited origination fee, lender fees, audit findings, and consolidation loan rebate fees.
81	The new 799 design intent was to automate and speed up the processing of information on the quarterly billing. We also envisioned that this meant the turnaround time from the submitted date to the date funds are paid to the Lender would be significantly reduced to between 1-10 days. This would be a benefit to the business aspect of companies reporting. If this is not the case, please explain what should be expected for turnaround time and any additional detail, such as time in the Department of Treasury prior to payment, especially if there are no errors on the first submission. If errors are found upon submission, what is the process and timeframe we should expect?	Funds Disbursement	SFA anticipates 3 - 10 days from receipt of invoice to transmission of payment for electronic filing if no errors are found during processing the invoice. If errors are encountered during invoice processing, the payment of that invoice will depend upon the sender correcting the errors.
82	This agency would advocate the continued practice of netting out the funds due to and from the Lender. This will make the accounting easier to manage from the Lenders points of view and would keep the process as it is now for the Department of Education's accounting methods.	Funds Disbursement	The agency will continue to the proactive in offsetting fees due within the LaRS application.

#	Comment	Category	Answer
Funds Remittance			
83	Future Funds Remittance Process: If we start using this function once LaRS is implemented, we will immediately start using it for paying our monthly consolidation rebate fee too? If so, when/how will DE communicate the new procedure for filing consolidation rebate fee data?	Funds Remittance	The future funds remittance process will include the ability to pay Monthly Consolidation rebate fees. This process is intended to be in place concurrent with the implementation of LaRS, and will replace the current process. A community conference call to discuss funds remittance is schedule for January 31 to discuss this topic.
Interest Calculation Scenarios			
84	Interest Rate Scenarios: 2.4 Benefits (for non-serviced lenders) It does not appear that a remittance email will be sent. Is this true, or is that a typo?	Interest Calculation Scenarios	A remittance notice will be sent. The Interest Calculation document was updated to reflect the notice.
85	Interest Calculation Scenarios: The interest payment will be automatically calculated based on lender selection. This includes current billing. The adjustments processed utilizing specific servicing system calculation may be different from the selected method. (Also referenced in #4)	Interest Calculation Scenarios	SFA encourages the Lender to submit adjustment amounts consistent with the selected interest calculation method.
86	Interest Rate Scenarios: Scenario 3 Different Servicers for Same LID, Description: The Description states that Lenders will be able to view the interest calculation method used by the Servicers to select an interest calculation method. From the January 7th SLISA conference call, it does not appear that there is any place for Servicers to indicate the interest accrual method they use and therefore, it does not appear that Lenders will be able to view the method used by their Servicer. Is this correct?	Interest Calculation Scenarios	When the Servicers verify their own information during the LAP process, it is requested that they identify their interest calculation method. This will be used to assist the Lenders when the Lenders select an interest calculation method for each of their LIDs.
87	Interest Rate Scenarios: Scenario 4 Different Servicers for Same LID, Roles and Responsibilities: The second bullet states "The application process automatically selects the interest calculation method for the LID based upon the method used by the first Servicer that is associated with the LID or a specifically identified Servicer." Again, if the interest accrual method used by each Servicer is not stored on LARS/LAP, then this statement appears to be incorrect and should be removed. Also, the third bullet states that a Lender may associate additional Servicers to their LID as long as the additional Servicers use the same interest calculation method as the identified Servicer. If the Lender tries to add a Servicer that uses the other method, a warning is issued. This does not appear to be correct, assuming the LAP/LARS system does not store the interest accrual method for Servicers. The other bullets in this section should be revisited, if LAP/LARS does not store the interest accrual method used by Servicers.	Interest Calculation Scenarios	When the Servicers verify their own information during the LAP process, it is requested that they identify their interest calculation method. This will be used to assist the Lenders when the Lenders select an interest calculation method for each of their LIDs.
88	Interest Rate Scenarios: However IF the LAP/LARS system could store the interest accrual method used by Servicers, it would make things much easier for both Lenders and Servicers. Lenders would be much more assured that they would receive the money they were expecting. This is a real concern, especially as you roll LARS out, because a lender who chooses the wrong method out of ignorance or just because they hit the wrong key may be prevented from making a change to their interest accrual method for 4 years (16 quarters!). They may not be aware that they have made a mistake until they receive their first LARS payment and can't figure out why the interest amount is not what they are expecting to receive. It would be a shame to lock Lenders into an incorrect (for them) method just because they inadvertently chose the wrong method for their servicer – think how much better it would be if the LAP screen could come back with a warning!	Interest Calculation Scenarios	When the Servicers verify their own information during the LAP process, it is requested that they identify their interest calculation method. This will be used to assist the Lenders when the Lenders select an interest calculation method for each of their LIDs.
89	According to LaRS Interest Calculation scenarios discussion draft page 8, it states under 4.3 "the application process automatically selects the interest calculation method for the LID based upon the method used by the first Servicer that is associated with the LID or a specifically identified Servicer." "If the Lender attempts to add a Servicer that uses the other interest calculation method, the Lender receives a warning message." If the Lender has specified 365/366 and has some Servicers that file 365/366 and some that file 365.25 will the DOE honor the 365/366 or will the Lender receive a "warning message"?	Interest Calculation Scenarios	DOE will use the interest rate calculation method selected by the Lender. The document was updated to remove the warning message.
LAP			
90	Can we sign up for LAP on our existing LID's and not use LaRS at this time but continue to do paper filings?	LAP	All participants in the program will need to go through the Lender Application Process (LAP). However, the LaRS can be submitted manually. Be advised that SFA strongly recommends Lenders submit electronically. The manual LaRS process will result in a longer timeframe from submission of invoice until funds disbursement.
91	In previous meetings and conference calls, we have mentioned that ED and the servicing community must collaborate on the LAP process for lenders. For example: 1) § A process needs to be established whereby a servicer is aware of which client lenders have and haven't provided LAP input; 2) Servicers should be able to quickly determine what information their client lender has provided through the LAP which may or may not be consistent with what the servicer thinks should have been input.	LAP	Lenders can contact osfa.lr@ed.gov requesting specific information. Once a Lender has established an association with a Servicer in LAP the Servicer will be able to see each Lender with which it has been associated. Currently no plans to allow the servicers to view a Lender Record exists.
92	We will be very interested in getting more information on the LAP and LARS testing. 1) What are the begin- and end dates for testing? 2) Is there a formal test plan that you would like us to work through, or will we be responsible for designing our own test plan, or both? 3) Will we have an opportunity to test both the LAP and LARS web screens and the file transfer process? 4) Will there we be testing each part of the process without regard to what comes before and after each separable part? Or Will the testing be more of an integrated 'system' test, where test data flows through the system? For example, an integrated 'system' test would include everything from setting a lender up on the LAP to the generation of a final (test) payment notice to the lender. 5) We would like to be able to test both the LAP/LARS online web screens and the file transfer process.	LAP	A conference call to discuss testing is scheduled for February 7, 2002.
93	In regards to the LAP process is the person who approves and enters the information be the same? or can it be different?	LAP	The person who enters data into the LAP can also submit the LAP to SFA.
94	Signatures for the LAP process should be from whom?	LAP	The Authorizing official is the name of the person in your organization is responsible for submitting correct financial data and/or has authority to commit organization or company funding.

#	Comment	Category	Answer
95	I don't think I'm clear on how the typed name and title will be identified separately from the contact data, which may come with training.	LAP	As part of the LAP process the Lender/Service will verify the institution name.
96	I have a question about the LAP form. We have quite a few LID's & everything is 3rd party serviced. Will we have to file by LID, or can we combine the LID's & file by servicer?	LAP	A LAP must be completed for each LID. As part of the LAP completion process Lenders must select the Servicer associated with each LID (if applicable).
97	Will there be a separate LAP for each LID? In previous versions of the LAP, a Lender with multiple LIDs could complete a LAP where the LAP was completed for a "lead" LID but other LIDs for that lender would also be shown. In thinking this through, the characteristics of one LID or group of LID's (guarantor, servicer, even name and bank account information) might differ from the characteristics of a different LID or group of LID's, within the same Lender. If the LAP information is to truly represent the characteristics of a lender's student loan portfolio, then lenders should either be required to submit one LAP for each LID, or lenders should be allowed to group LIDs together provided all LID's within the group have the same characteristics.	LAP	There will be a LAP for each LID.
98	There is mention made of the LPQ. What is this and how is it different from the OPA and LAP?	LAP	The LAP replaces the Lender Participation Questionnaire (LPQ). It's purpose is to capture profile data. The OPA certifies that the Lender/Service agrees to submit data electronically.
99	As far as setting us up on the system we are not sure how the LAP process will work in regards to our servicer. We service 90% of our portfolio but we do use a Servicer for the remaining 10%. We only use one LID. Will we both enter the data?	LAP	Yes. You will both complete the LAP. You will just identify Servicer A as a servicer. The purpose of the LAP is to capture profile data (including relationships--not necessarily the extent of those relationships).
100	Servicers need the ability to update the information within LAP. It will be too difficult to 'cleanup' information after it was copied into LaRS.	LAP	Lenders will be required to update their own data within the LAP.
101	Lender Application Process (LAP), Existing Lenders and Servicers: We would like to see the interlude when the LAP is down while its data is transferred to LaRS kept to a minimum. We believe that many lenders will wait until absolutely the last minute, or maybe past the last minute, to complete their LAP. For lenders who are serviced, this will likely be because they are used to their servicer doing everything for them and do accept / understand that this is something they have to do themselves. For non-serviced lenders, it may happen because the lenders are not as aware as they should be of timelines. Also, for small lenders, it may take time for them to get a connection to the Internet	LAP	The entire LAP will be unavailable during the two-week conversion timeframe. This will allow ED-SFA to match LAP submissions to OPAs, and approve LAP data for transfer. Data approved for transfer into LaRS will be removed from LAP, and any future updates to that data must be made via LaRS. There are over 4,000 LIDs subject to this review and transfer process; given that number and the need for OPA verification, ED-SFA is not comfortable reducing that timeframe. Following the two-week conversion, LAP will be made available again. This conversion will be timed appropriately with the deployment of LaRS.
LaRS			
102	Revised 799 Form: Will the format for reporting "Calendar Year" on Part IV be YYYY or YY? On the current 799, a two-digit year is used, yet on the electronic submission, a four-digit year is required.	LaRS	The year format will be YYYY.
103	Revised 799 Form: The Loan Types reported on Parts II, III, and IV should be changed to be consistent with the new reporting requirements, otherwise it will be very confusing and cumbersome to maintain the representation of two sets Loan Types.	LaRS	LaRS will use NSLDS Loan Type Codes shown below: SF = Stafford except unsubsidized Stafford PL = Federal PLUS SL = Federal SLS CL = Federal Consolidation SU = Unsubsidized Stafford
104	Based on your preliminary review in regards to the future automation changes, will the program changes be on the DOE end exclusively?	LaRS	SFA will work with the community to minimize the impact that any future changes have on Lender/Service systems and processes. It is likely, however, that certain desired functionality, such as automated log in for file transfer, may require changes on both SFA and community systems in order to ensure that appropriate security and controls are in place.
105	If there are multiple servicers filing under one LID, how will the DOE know not to reject any 799 after the first 799 is filed? (DOE verbiage under LaRS File Transfer Process and Record Layout reads "Note: Lender/Service will be allowed to submit only one invoice per quarter. Invoice duplication will be prevented based on a unique key combination." Please clarify this information.)	LaRS	One invoice per quarter may be submitted for a unique combination of Servicer ID (if applicable), LID, quarter, and year.
106	Revised 799 Form: Relative to the revised 799 report, which has not yet been issued in final, we are concerned about the use of old vs. new codes as the switch over occurs. For example, assuming the revised 799 becomes effective for Q2 '02 billings, if we are in the process of resolving issues with a prior quarter's 799 report that was rejected for payment, can it be resubmitted in the new layout using new codes after the switchover to the revised 799 format? We prefer not to maintain old and new codes at the same time. In the example described, we would prefer to resubmit a client's 799 report using new codes.	LaRS	The LaRS application will only accommodate new codes. We encourage those Lenders and Servicers who are resolving errors on prior quarter invoices to get the invoices completed prior to the implementation of the new LaRS process.
107	Revised 799 Form: There is inconsistency between the various "Parts" of the 799 – for the electronic vs. hard copy versions of the 799. In order to avoid confusion, we suggest that the titles of the Parts be the same for both versions	LaRS	The existing 799 will expire when LaRS is implemented. The LaRS application will become the main means of submitting invoice data; a paper-based LaRS will be made available for Lenders unable to use the online LaRS application. The titles for the parts of the online and paper-based LaRS are consistent, and both the online and paper-based LaRS will collect the same data.
108	Revised 799 Form: Line 1 from Part V of the 799 ("Check if adjustment to prior quarter") should be removed from the hard copy version since it has been removed from the electronic version of the 799	LaRS	The existing 799 will expire when LaRS is implemented. The LaRS application will become the main means of submitting invoice data; a paper-based LaRS will be made available for Lenders unable to use the online LaRS application. The titles for the parts of the online and paper-based LaRS are consistent, and both the online and paper-based LaRS will collect the same data.

#	Comment	Category	Answer
109	How easy will it be for Lenders or Servicers to view the LaRS information? How long will approved LARS submission information be retained online? If it is not retained online, will it be accessible any other way? Or will approved LARS submission information become the equivalent of the current Lender Search Report, with payment information added, once the lender's payment (or ED's receivable, if the lender owes money) has been approved or paid? How long will the Lender Search Report information be retained online? We suggest retaining that LARS submission information and/or the Lender Search Report online at least 18 months (6 quarters) following the end of the quarter in which the LARS is submitted (for a LARS submitted in July 2002, the information should be retained online at least through March 2004).	LaRS	Lenders can view data in the LaRS application simply by logging on and running the desired report. Data will be retained in the LaRS application for a minimum of five years. A Lender Search report, among other reports, will be available for a minimum of five years worth of data, starting with quarter ending June 30, 2002.
110	Did I understand correctly that the ED Form 799 could still be submitted manually indefinitely, beyond the second quarter?	LaRS	The 799 will not be a valid form once LaRS is implemented. There will be a paper-based version of the LaRS data available to Lenders who are unable to use the online LaRS application. SFA strongly recommends, however, that Lenders submit electronically in order to receive payment as quickly as possible.
111	799 Payment Process: During the January 7, 2002 conference call with the industry to discuss the LaRS Road Map, one of the follow-up action items for ED was to finalize with its CFO Accounting office the determination of the total number of days required for the payment of the electronic 799 invoices. Subsequent to this call, we were informed that the expected turnaround time would be 7 to 10 days following ED's receipt of the acceptable 799 invoice. During the SLSA meeting held January 18, ED representatives explained that the 7 to 10 day turnaround applied to the transmission instructions to the US Dept. of Treasury to pay the 799 proceeds. Servicers need to be able to convey to its clients when they can expect to receive 799 proceeds. In previous meetings, ED officials have indicated to us that we can expect to receive 799 proceeds at least as fast as we have in the current electronic process. We also need to be able to assure our lender clients of this fact. ED should research this matter and convey to the community the expected timeframe between receipt of the acceptable 799 and the actual payment of the proceeds for the invoice.	LaRS	We have confirmed that once DOE's CFO has sent the request for payment to Treasury, Treasury will not hold funds. SFA anticipates that the time from electronic submission of a correct invoice to payment to the Lender will be an average of 3-10 days.
112	No mention has been made regarding changes in the edits between the existing 799 and the new LaRS. In working with several servicers, I've noticed that each seems to have philosophical differences in how to put data on the form, and I would like to know if these issues would trigger rejects of the 799. Currently, many trigger reasonability test failures. One example would be the interpretation of whether or not to include ending balances in the interest billing portion when the loans aren't billing interest due to delayed delivery. Another example is seen as changes in the opening balance on what is currently Part 5. Some servicers carry over their prior ending balance while others believe that prior period adjustments should create modifications to this number	LaRS	The LaRS web application will contain soft edits that will prevent Lenders from making data entry mistakes. Hard edits, which are triggered after a lender clicks on the submit data will verify invoice data against business rules and prior quarter data. Reasonability edits will not prevent an invoice from being submitted or paid; instead they will be listed on a report that will be reviewed quarterly by SFA.
113	Also, on page 8 of the same document under 799 Section, Part V comments, will the DOE be balancing back to the prior quarter especially since the ending principal balance does not exist in LaRS? T	LaRS	With the exception of the first LaRS production quarter, SFA will balance back to the prior quarter.
Notification Matrix			
114	Notification Matrix: Add LID to notice #10.	Notification Matrix	Notice 10: "User ID and Password Activation Notice" will be divided into two separate notifications. One notification will include the LID, User ID, and the name of the representative to whom the User ID has been assigned. The second notification will include the LID, password, and the name of the representative to whom the User ID has been assigned.
115	Notification matrix: In all notices, we suggest spelling out "SFA", or showing it the first time in any notification letter as "Office of Student Financial Assistance (SFA)", rather than just using the initials. We believe the initials SFA are commonly used and understood by ED staff, but not by lenders.	Notification Matrix	The SFA acronym will be spelled out on all notifications where it appears for the first time.
116	Notice 1 – LARS Reasonability Failure Notice: We suggest the word "probability" in last sentence in the second paragraph be changed to "possibility". There are numerous reasons why the reasonability edits themselves are in error, while the data reported is absolutely correct. The word "probability" will alarm lenders unnecessarily.	Notification Matrix	The word "probability" was changed to "possibility".
117	Notice 3 – EFT Payment Notice: The term "Electronic Funds Transfer (EFT)" should be changed to "Automated Clearing House (ACH)" if that is truly the method of payment. That is a more precise wording than "EFT", which can mean either electronic payment via wire transfer (same day effective date) or via ACH transfer (next day effective date).	Notification Matrix	Electronic Funds Transfer (EFT) was changed to the Automated Clearing House (ACH).

#	Comment	Category	Answer
118	Notice 7 – LAP Error Notice: The first paragraph in the notification should be changed somewhat for clarity. Specifically, the second sentence would be changed to read “These errors must be corrected before you can participate in the Federal Family Education Loan (FFEL) Program, and before you can receive any subsidized interest and Special Allowance benefits to which you are entitled.” The last sentence in that paragraph should also be changed to read “Once corrected LAP information is received, ED SFA will process your <Lender Identification Number or Servicer ID> LAP application, allowing full participation in the FFEL Program.	Notification Matrix	The second sentence in Notice 7: “LAP Error Notice” was changed to read, “These errors must be corrected before you can participate in the Federal Family Education Loan (FFEL) Program, and before you can receive any subsidized interest and Special Allowance benefits to which you are entitled.” The last sentence in that paragraph was also changed to read “Once corrected LAP information is received, ED SFA will process your <Lender Identification Number or Servicer ID> LAP application, allowing full participation in the FFEL Program.”
119	Notice 7 – LAP Error Notice: The second paragraph refers to “failed test data”. We do not believe that Lenders or Servicers who are attempting to submit accurate LAP data will think they are entering test data. The word “test” should be dropped from the message.	Notification Matrix	The word “test” was removed from the second paragraph of Notice 7: “LAP Error Notice” .
120	Notice 7 – LAP Error Notice: Why is any Notification necessary, for Lenders or Servicers who submit their LAP using the Web screens? Shouldn't the Web screens perform edits that will ensure that accurate data is entered?	Notification Matrix	Notice 7: “LAP Error Notice” will only be used for Paper-based LAP applications. Lenders/Servicers who submit their LAP using Web screens will see edits performed in real time.
121	Notice 14 – LARS Rejection Notice: Same as above. The word “test” should be dropped from the explanation. Following LARS implementation, Lenders and Servicers would expect to be submitting real, not test, data.	Notification Matrix	The word “test” was removed from Notice 14: “LaRS Rejection Notice”.
122	Notice 4 – LARS Status/Error Report Notice: Would lenders who owe money to ED, as well as lenders to whom ED owes money, both potentially receive this notice? If so, perhaps the word “payment” in the second sentence of the first paragraph should be changed to “submission”.	Notification Matrix	Notice 4: “LaRS Status/Error Report Notice” is only for Lenders/Servicers to whom ED owes money. The word “submission” refers to the Lender/Servicer's LaRS. The name for Notice 4 was changed from “LaRS Status/Error Report Notice” to “LaRS Error Notice”.
123	Notice 4 – LARS Status/Error Report Notice: The word “test” should be removed from the second paragraph.	Notification Matrix	The word “test” was removed from Notice 4: “LaRS Status/Error Report Notice”.
124	Notice 5 – Lender/Servicer Deactivation Candidate Notice: With LARS, multiple LARS may be submitted for a single LID, but each will have a unique LID/Servicer ID combination. The Deactivation Candidate notice should be sent only when no LARS (from either the lender or any servicer) has been received for a LID within 180 days. The unique LID/Servicer ID combination does not determine whether this letter should be sent out; rather, the determination should be made based on the LID alone. Lenders often change switch servicers for either part or all of their student loan portfolio, or they may switch from being self-serviced to using a third party servicer. Alternatively, they may sell all their loans and stop participating in the FFEL Program, and those are the lenders that should receive this letter. That is why it is the LID (only) that should be the determining factor for sending this letter. However, if the determination is made that a lender should be deactivated, both the Lender and its Servicer(s) should receive this notice.	Notification Matrix	The LID is the determining factor for deactivation. If no invoice has been received for a LID in 180 days, that LID will be deactivated. The Notice was changed to remove the Servicer information. A change in the Servicer for a LID, however, should be reported in the profile information in LaRS, and on an OPA.
125	Notice 5 – Lender/Servicer Deactivation Candidate Notice: Out of curiosity, how does ED know whether origination fees have been received on loans for which claims have been filed? Data shown on the 799/LARS is all summarized and does not include loan-level information. Does this sentence really mean that once a LID is deactivated, claims can no longer be filed? Paid? Since claims are filed with the Guaranty Agencies, is there communication between ED and the GA's when a lender is deactivated, with ED directing the GA's not to accept (or pay?) any claims that the lender might file after it is deactivated?	Notification Matrix	SFA does not know whether origination fees have been received on loans for which claims have been filed. Once a LID is deactivated, no invoices can be processed; if there are invoices that remain to be submitted and paid, the LID will need to be reactivated by contacting the SFA Help Desk. The Guaranty Agency is notified when a LID is deactivated.
126	Notice 9 – Lender/Servicer Identification Number Deactivation Notice: Same comments as for Notice 5 (items 9 and 10, above).	Notification Matrix	The LID is the determining factor for deactivation. If no invoice has been received from a LID for 180 days, that LID will be deactivated. Servicers are not impacted.
127	Notice 6 – Lender/Servicer Identification Number Activation Notice: The Notification Matrix indicates that this notice will go out via email, regardless of whether the Lender or Servicer is Web LAP or Paper-Based LAP. Is this correct? The Comments speaks about mailing this notice to Paper-Based LIDs, but there is no indication of how Lenders or Servicers who complete the Web-Based LAP receive notice of Activation.	Notification Matrix	The Notification Matrix indicates that Notice 6: “Lender/Servicer Identification Number Activation Notice” will go out via paper letter, regardless of whether the Lender/Servicer is submitting LAP via the Web or hard copy.
128	Notice 11 – Lender/Servicer Profile Change Notice: Is the “profile” information the same as the “LAP” information? If so, it would be very helpful if the changed information could be shown (i.e., Lender Name was changed from ABC Bank to XYZ Bank). That would ensure that the lender's records are kept in synch on all systems (Lender, Servicer, and ED). Also, it gives the lender the opportunity to check the changes that were made, to ensure that they were made correctly and that only the requested changes were made.	Notification Matrix	The fields that have a change will be mentioned on the notification. Due to security issues with email, specific changes to these fields will not be included.
129	Notice 11 – Lender/Servicer Profile Change Notice: If a lender submits a paper LAP, but its loans are serviced by a servicer that submits everything electronically (either Web or file transfer), can the servicer receive this notice via email?	Notification Matrix	The Notification Matrix shows that a Servicer can receive Notice 11: “Lender/Servicer Profile Change Notice” via email.
130	Notice 13 – LARS Processing Delay Notice: The Notification Matrix indicates that this notice will be sent to the Sender. What is the intent of this notice? Does it indicate that electronic file transmissions have been sent but they cannot be loaded to ED's Oracle system, so any submissions will not be visible on the Web? (Not sure how to respond to this notice because its purpose is not clear.)	Notification Matrix	Notice 13: “LaRS Processing Delay Notice” alerts the Lender/Servicer of LaRS downtime that will delay their invoice being loaded into LaRS. Since the data will not be loaded, it will not be accessible by the Sender. It will also be delayed in processing. The intent is to notify the Sender of LaRS data in the event that processing is delayed.
131	Notice 15 – Dunning Notice #1: Why is “Interest Due” shown on this letter? From the second paragraph, it appears that interest will only be due if payment is not received immediately. If that is not the case, then the second paragraph should be amended. Or, does interest start to accrue from the “Start Date”? If so, then the table should be changed to be more descriptive of what is actually occurring. Perhaps an “If Paid By” date column should be added just to the right of “Amount Due”, and a second column should be added to the right of “Total Due” indicating the date by which the “Total Due” payoff amount must be received, to avoid additional interest charges.	Notification Matrix	“Interest Due” is shown on Dunning Notice #1 so that the information provided is consistent with Dunning Notice #2. “Interest Due” will always be zero for Dunning Notice #1. Interest accrues from the start date. The wording on Dunning Notice #1 was changed to say “A review of your account indicates that you have an outstanding balance. To avoid being assessed interest charges, pay your outstanding balance within 30 days from the date of this letter.”

#	Comment	Category	Answer
132	Notice 16 – Dunning Notice #2: Same comments. If lenders do not pay the amount due, what is the result? Are they terminated from the FFEL Program, if they do not pay within some period of time? If so, perhaps this letter should indicate the consequences of continued non-payment, instead of just some non-specific "further action". Or is there more to it than that?	Notification Matrix	If Lenders do not pay the amount due, ED will assess interest and applicable penalties on the account. If necessary, ED will revoke the insurance on the loan.
133	The summary e-mail that was requested was not included in the documentation. Is there one or was that not feasible?	Notification Matrix	Notice 10: "User ID and Password Activation Notice" will be divided into two separate notifications. One notification will include the LID, User ID, and the name of the representative to whom the User ID has been assigned. The second notification will include the LID, password, and the name of the representative to whom the User ID has been assigned.
134	Notification Matrix: On notice #11, list the changes that were made to the profile as a way for the sender to confirm that the changes are correct.	Notification Matrix	The fields that have a change will be mentioned on the notification. Due to security issues with email, specific changes to these fields will not be included.
135	There were no sample letters showing when the lender owes money.	Notification Matrix	This requirement is addressed in Notices 15A and 15B: "Dunning Notice #1" and Notices 16A and 16B: "Dunning Notice #2". No notifications are sent until amounts owed to ED are past due.
136	I was disappointed to see that the letter for payments due to the lender are summarized rather than breaking down the parts (fees, interest, special allowance), but I was surprised to see that letters were created for payment by check since I thought that all payments were required to be made by ED via EFT.	Notification Matrix	Payments due to the Lender/Service are not included due to the risk that email sent over unsecured lines could be intercepted. As a result, SFA refrains from including sensitive, detailed information (such as fees, interest, special allowance) in its notifications.
137	Notification Matrix: Data formats/contents for all failed 799s emails are needed with the release of the documentation supporting the electronic 799 to determine how the email data can be captured and input it into our database.	Notification Matrix	Consistent invoice reject email notification will be sent. Users can automate as needed.
138	Notification matrix: Relative to Item 8 on Page 4, an email is also needed so that we know if the file transfer is successful. This is similar to the current EDI process, where a 799 Acknowledgement file is generated that indicates if the file is accepted or rejected. An email for a successfully received file will be even more important when the automated file transfer is implemented.	Notification Matrix	This requirement is addressed in Notice 17: "File Transfer Confirmation". The sender of a file using the file transfer approach will receive a notice (email) (See Notice number 14 and xx) indicating whether or not the file itself was accepted or rejected.
139	Notification Matrix: The total number of email addresses in which email can be sent should be added to the documentation	Notification Matrix	Up to three email addresses each for the Lender and the Service can be stored in the application and designated to receive notifications.
140	Notice 10 – User ID and Password Activation Notice: Looks good!	Notification Matrix	No Action Required.
141	Notice 12 – Penalty Interest Notice: Looks good!	Notification Matrix	No Action Required.
142	LARS Notification Matrix. Develop an optional system of any notification containing dollar amounts via e-mail or by notification that information is available for viewing through another secured area.	Notification Matrix	Email sent to the Lender will not contain summary financial data. Lenders and Services will be able to view detailed financial data within the LaRS application.
OPA			
143	The person who signs the 799, at least in our organization, is not the person who will sign the OPA. Our understanding of the OPA is that you are expecting an officer of the Corporation to sign the OPA. The person who signs the 799s, in our organization, is a mid-level staff person, not an officer.	OPA	The OPA will be made available to the community in late February. The OPA is still under review.
144	To facilitate the upload of lender data into ED's system, servicers should be able to submit to ED the Organization Participation Agreement (OPA) information on all their clients in a single file. A single form prepared per LID is not efficient.	OPA	By definition the OPA is a hardcopy form. Each Lender must submit one OPA listing all LIDs.
145	Also, if the signer of the OPA leaves the company, what would be the security requirements?	OPA	The OPA is signed by an official who can commit the institution to the agreement. A person acting in that capacity has obligated the institution, and the obligation remains in place regardless of whether or not that individual remains with the institution.
146	How can the Lender look up their LID's to see if the information provided by the Service is correct at the DOE if the Service signs the OPA?	OPA	Lenders, as well as Services, will need to sign OPAs in order to have their LaRS data submitted electronically. All Lenders will be able to log on to the LaRS application to view data for all of their LIDs.
147	What was the change to be made to the OPA? If it is to be changed then when will we be able to obtain the new agreement? This is important because we will need to communicate this to our lenders soon. Also, I thought I heard in the call today that a servicer would have to submit an OPA for each LID if we will be submitting the lender's 799 on their behalf? And if that is true would the lender still need to send in an OPA?	OPA	A new OPA with revised instructions will be disseminated in February. Lenders, Services, and Trustees will need to submit OPAs; one OPA will cover multiple LIDs.
Paper Vrs Electronic			
148	Now that paper submission will be accepted what is the incentive to program the Electronic Filing?	Paper Vrs Electronic	SFA anticipates an average of 3 - 10 days from receipt of a valid invoice to transmission of payment for invoices filed electronically. Invoices submitted using the paper-based process may take up to 30 days.

#	Comment	Category	Answer
149	As a lender with several servicers on various LID's, what guarantee is there that the DOE would honor the lender's wishes (i.e.: to file paper forms) over the servicers' OPA's? Who signs the DOE forms? Lender? Servicer? Which form takes precedence at DOE in case both Lender and Servicer send in forms referencing the same LID?	Paper Vrs Electronic	Electronic submissions will not be accepted unless there is a signed OPA on file with ED from the eligible Lender. An OPA represents permission to file electronically, so Lenders who do not wish to file electronically will not need to submit an OPA. Additionally, Lenders may use the online screens to grant a certain level of authority to a Servicer; Lenders can choose to restrict Servicers to "view" authority, in which case a Servicer will not be permitted to submit any data on behalf of the Lender. Note, however, that using the paper-based process will result in a longer time between invoice submission and payment.
150	Will the paper 799 form be updated since it has expired and if so what changes are there?	Paper Vrs Electronic	The 799 is being extended so that it will be valid until the implementation of LaRS. Once LaRS is implemented, the news LaRS format will be the only means of submitting data. A draft of the paper-based LaRS form will be made available in late February. It will be very similar to the online LaRS screens.
151	Will the paper be changed to match the layout for electronic filing? or are you going to be able to process both the old format and the new electronic file independently? (or is the DOE able to process both paper and Electronic submission with different naming conventions per section?)	Paper Vrs Electronic	The 799 is being extended so that it will be valid until the implementation of LaRS. Once LaRS is implemented, the news LaRS format will be the only means of submitting data. A draft of the paper-based LaRS form will be made available in late February. It will be very similar to the online LaRS screens.
152	Future Paper Based LaRS Process: Will the paper LaRS just be a printed version of the LaRS web form or will it really be just the continued use of the existing paper 799 form?	Paper Vrs Electronic	The paper-based LaRS will contain all fields that exist within the LaRS application. It will not be the current 799. It will be very similar to the online LaRS screens.
153	Can you mix electronic and paper filings under one LID?	Paper Vrs Electronic	Yes.
Reports			
154	Crosswalk: Provide a list of canned reports established.	Reports	A list of reports will be provided as part of the user guide. The Lender Search report will be included.
155	Crosswalk: Define specific data elements for Ad Hoc reporting.	Reports	No Ad Hoc reporting functionality will be provided.
156	I would like information on reports--e.g., what will be sent? what will be available on line? If servicers are sending data directly to ED on lenders behalf, I just want to know what, if any, automated responses/reports will be provided to the lender.	Reports	A list of reports will be provided as part of the user guide. Automated responses have been included in the Notification document, which is part of the Final Road Map. Lenders can also go to the LaRS application online and view their data.
Road Map			
157	File Transfer and Future LaRS Process: Page 3 of the FTP document says "to resubmit a file, the Lender/Servicer will follow the same process that they originally used for submitting the file." However, page 7 of the PowerPoint slides seems to indicate something different. It looks like Step 2B (FTP rejected) points to the Web Form. If the FTP file is rejected, why would we be directed to the Web Form? Shouldn't 2B point to the sender? If the file is accepted, it makes sense to me to point to the Web Form to indicate that the data is available for viewing via the Web screens.	Road Map	If a user elects to submit a file via the 'File Transfer (FT)' method, rejected files and invoices will be resubmitted using File Transfer. However, users of this method can still go to the FMS website to access relevant data in read-only format once that file has been 'successfully' submitted to FMS. Page 7 of the Road Map was updated to reflect an email going back to the "file transfer" PC.
158	All procedures in the redesign project need to be clearly documented step by step and include detailed timelines for implementation of the new process prior to the final rules being issued. This will allow time for any questions that might be missed without the benefit of reviewing the detailed procedures. Example; LARS Security Overview-Page 3 OPA- Include detailed instructions on who needs to sign where. The instructions need to be specific as to Servicer/Lender who qualifies as the authorizing official.	Road Map	A number of documents are intended to provide detailed information and step-by-step instructions. The Road Map final documents provide some of that information, including details on the file transfer layout. A communication in February will provide security forms and instructions and OPA forms and instructions. User Guides and other materials will also be provided to the community.
159	Roadmap: Update the File Transfer flows to include the following: 1) Pg. 6 – Current 799 Process: Add the 799 Acknowledgement transmission from ED to Lender/Servicer, via EDI.	Road Map	Email notification will be provided to the submitter indicating accepted/rejected status of each invoice.
160	Roadmap: Update the File Transfer flows to include the following: Pg. 7 – LaRS Process: Add an Accepted/Rejected Email that file was received and properly formatted.	Road Map	Email notification will be provided to the submitter indicating accepted/rejected status of each invoice.
161	Roadmap: Update the File Transfer flows to include the following: Add future automated file transfer from Lender/Servicer to ED.	Road Map	ED SFA is researching methods to provide an automated file transfer process. The automated approach will not be included in the July 2002 version of LaRS.
162	The Road Map needs to be updated based upon additional followup and research by SFA		Several of the current and future diagrams were updated: page 4 step 1; page 5 step 1A, SFA; page 7 step 2A; page 9; page 10 step 1; page 11 step 4A; page 12. The Introduction page was updated to reflect current timeline information. The Revised Project Timeline page was updated for an extended LAP testing. The Background Summary page was updated for LaRS Online File Transfer.
Security			
163	What guarantees are there that the LID's Lender name and address shown in Part 1 (1.) at the DOE won't be changed by DOE's Help Desk? (i.e.: there was a problem in 2000 where the DOE changed LID's addresses and then had to correct them to the right addresses---could this happen again? If someone calls into the DOE Help Desk---what security guarantees are there that this won't happen?)	Security	The primary method of changing the Lender name, address, or other profile data should be through the online LaRS. This application is secure, and all changes can be entered and verified by the user. Lenders who choose not to use the online LaRS application will need to submit a signed written request to change profile data, and an email to the Help Desk confirming the request. The Help Desk will not make any changes to Lender profile data without both a signed written request and an email from the Lender.
164	Security Overview: Please define any limitation to the number of representatives requiring access to LaRS	Security	ED-SFA has purchased a limited number of licenses to allow users to connect to LaRS. We estimated an average of 2 user IDs per Lender, which should be sufficient for most Lenders. After the initial distribution of user IDs, we will consider requests for additional User IDs on a case-by-case basis provided we have additional IDs to distribute.
165	Security: Please allow for at least 4 lender representatives to have access to the LaRS application.	Security	ED-SFA has purchased a limited number of licenses to allow users to connect to LaRS. We estimated an average of 2 user IDs per Lender, which should be sufficient for most Lenders. After the initial distribution of user IDs, we will consider requests for additional User IDs on a case-by-case basis provided we have additional IDs to distribute.
166	Security Overview: Lender Application Process (LAP), Existing Lenders and Servicers: Would ED consider moving lenders' LAP data to LARS in batches, so that the conversion of all lenders would happen over time, but for any one lender, the conversion would occur maybe overnight? In that scenario, during the two-week conversion time period, a lender that wished to enter or make changes to their LAP data could do so but they might have to first check the LAP site. If their information was not there, they would then access and update it at the LARS site.	Security	The entire LAP will be unavailable during the two-week conversion timeframe. This will allow ED-SFA to match LAP submissions to OPAs, and approve LAP data for transfer. Data approved for transfer into LaRS will be removed from LAP, and any future updates to that data must be made via LaRS. There are over 4,000 LIDs subject to this review and transfer process; given that number and the need for OPA verification, ED-SFA is not comfortable reducing that timeframe. Following the two-week conversion, LAP will be made available again. This conversion will be timed appropriately with the deployment of LaRS.

#	Comment	Category	Answer
167	Security Overview: Lender Reporting System (LARS) Security Forms: In Monday's conference call, it was stated that User Ids and their associated Passwords would expire X (180?) days after they were last used. Have you given any thought as to whether passwords should expire after a certain time, regardless of when they were last used? Or is that viewed as something under the lender or servicer's control?	Security	The system will require that a password be changed every 90 days. During that expiration process, the user will be required to change the password before being allowed to log on. This is distinct from the expiration process that will happen after 180 days of inactivity on an ID. In that case, the user will be required to contact the Help Desk to get an ID reactivated.
168	Security Overview: A separate security level is needed for file transfers. Staff handling file transfers may not necessarily be the same individuals assigned to correcting 799 reports and therefore should not be able to update any information via the web. This will be particularly important when the automated file transfer is implemented	Security	A user who submits invoice data via file transfer will have the same security level as a person submitting invoice data via the LaRS web-based screens. There is no difference in effect; in both situations, invoice data is being submitted. Security requirements for an automated file transfer are not yet determined.
169	We would very much like to see the OPA split into two documents, preferably by having one document for Servicers (only) and another for Lenders (only). On the Servicer document, the only changes needed are to replace the words "Lender/Servicer" with "Servicer" throughout the two-page document. On the Lender document, the only changes needed are to replace the words "Lender/Servicer" with "Lender" throughout the document. We believe this change will clarify the roles of both lender and servicer for the lenders we service. We believe they will be more willing to sign a document specific to lenders, if they can see that we, as their servicer, must also sign a document specific to servicers. If the wording on the OPA cannot be changed, can it be printed with something like a check box where the lender or servicer could indicate their role (i.e., they could indicate whether they are signing it as a lender or as a servicer)?	Security	More detailed information on the OPA will be communicated along with the LaRS automated process communications. The OPA will be made available to the community in late February. The OPA is still under review. ED-SFA is currently anticipating one document that may have different sections that apply only to Lenders, Servicers, or Trustees. When the OPA is finalized, it will be distributed to the community.
170	Need to make sure that security is tight with the new system.	Security	User Ids and Passwords will be provided to the community in order to establish a secure connection to LaRS for the transmission of data.
171	The security document needs to be updated based upon additional followup by SFA.		Removed the reference to the location of the current OPA on the IGAL site; added Trustee information; removed the sentence related to re-assigning user ids.
SFA			
172	Modification of Loan type for reporting purposes. Translations of current loan types (TG, TP, etc) into new loan types (SF, PL) will need to be done "downstream" prior to submitting the LARS.	SFA	LaRS will use NSLDS Loan Type Codes shown below: SF = Stafford except unsubsidized Stafford PL = Federal PLUS SL = Federal SLS CL = Federal Consolidation SU = Unsubsidized Stafford
Test Plan			
173	Will DOE testing allow the Lender/Servicer to electronically file an actual prior quarter 799 to test the DOE's system against figures the Lender/Servicer already has?	Test Plan	Yes. Further details regarding the testing plan will be provided in the testing conference call schedule for February 7, 2002.
174	The detailed steps to developing and implementing a testing plan have not been presented or explained to the community. To ensure a high level of success the steps of the testing plan need to be reviewed and modified if necessary by the various reporting entities.	Test Plan	A testing conference call is scheduled for February 7. During that call, we will discuss specifics for the testing of LAP and LaRS, and solicit community input.
175	Testing: More definition and specificity is needed for what ED is planning for the testing phase of the project to take place from mid-March through the end of May (page 14 of the LaRS Roadmap PowerPoint presentation). Sallie Mae is interested in testing the process with ED (as well as developing test scenarios) including such items as: Valid and Invalid File Layouts, Valid and Invalid Data Edits, Reasonability Failures, and Payment Notification	Test Plan	A testing conference call is scheduled for February 7. During that call, we will discuss specifics for the testing of LAP and LaRS, and solicit community input.
176	We would like to be involved in any testing including the LAP process.	Test Plan	A conference call to discuss our testing approach and get the community feedback is scheduled for February 7, 2002. As part of that call, we will solicit testing participants from the community, and discuss the level of testing participation desired.
Timeframe			
177	Work with Treasury to define how long it will take Treasury to process payments. Identify what may slow down or accelerate payments and communicate this to Lenders and Servicers. Revise the Road Map to reflect the total timeline.	Timeframe	We have confirmed that once DOE's CFO has sent the request for payment to Treasury, Treasury will not hold funds.
178	Ensure that Treasury is prepared to receive requests for payment earlier due to accelerated processing on the ED-SFA side.	Timeframe	We have confirmed that once DOE's CFO has sent the request for payment to Treasury, Treasury will not hold funds. We have confirmed that once DOE's CFO has sent the request for payment to Treasury, Treasury will not hold funds.
179	Broaden the payment timeframe to reflect the absolute shortest time from submission to payment.	Timeframe	SFA anticipates an average of 3 - 10 days from receipt of a valid invoice to transmission of payment for invoices filed electronically. Invoices submitted using the paper-based process may take up to 30 days.
180	Clarify wording for production date - "will be in production for quarterly filing beginning July 1, for quarter ending June 30".	Timeframe	We are changing the wording in the Road Map so that the implementation date is clear. LaRS will be in production by July 1, 2002, and all data for the quarter ending June 30, 2002, will need to be filed in the new format.
181	Will ED publish a new paper LARS form? When?	Timeframe	More detailed information on the new LaRS paper-based process will be communicated along with the LaRS automated process communications. A draft of the paper-based LaRs form will be made available to the community in late February. The process that the paper-based submission will follow is in the Road Map on slide 11.
182	When you say 'cut over' to a new format, it appears that one of the option of the new formats is a manual hardcopy submission. Will more info be coming in the future about this manual hardcopy submission option? I know it will not be encouraged but if our lenders know that there is still an option to submit in a manual hardcopy format (even if it is new format) they may still choose to submit manually (although we will not encourage it either)	Timeframe	More detailed information on the new LaRS paper-based process will be communicated along with the LaRS automated process communications. A draft of the paper-based LaRs form will be made available to the community in late February. The process that the paper-based submission will follow is in the Road Map on slide 11.
183	Based on an initial acceptance what is the time frame from beginning to end to receive payment from the DOE?	Timeframe	SFA anticipates an average of 3 - 10 days from receipt of a valid invoice to transmission of payment for invoices filed electronically. Invoices submitted using the paper-based process may take up to 30 days.

#	Comment	Category	Answer
184	What will be the expected time frame for turning payments around? Is it still 30 days?	Timeframe	SFA anticipates an average of 3 - 10 days from receipt of a valid invoice to transmission of payment for invoices filed electronically. Invoices submitted using the paper-based process may take up to 30 days.
185	Also what is the timeline for LAP? If we have to file a LAP for each LID then we will need some time to complete the forms.	Timeframe	LAP is currently anticipated to be available from March into June for the initial Lender Application Process. Following a two-week conversion, LAP will again be available in July.
186	Please determine the implementation date based on allowing two full quarters from receipt of final specifications for the file transfer. This extension would allow sufficient time for security application, system programming and testing	Timeframe	SFA will implement LaRS for the quarter ending June 30th. If a Lender or Servicer is unable to modify their systems to be able to submit electronically within that timeframe, there will be a paper-based submission process available as an interim solution.
187	We are somewhat concerned about the two-week time frame just before LARS implementation, when the LAP is shut down for conversion of that data to the LARS system. It would be very helpful if this down time could be kept to an absolute minimum, in order to accommodate new lenders or lenders whose LAP data needs to be modified. Will the LAP data for all lenders be 'down' for the entire two-week time, or will each lender be down for only a short time while its data is converted from one structure to the other? Is the LAP data going to be programmatically converted, or must it be manually keyed into the LARS structure?	Timeframe	The entire LAP will be unavailable during the two-week conversion timeframe. This will allow ED-SFA to match LAP submissions to OPAs, and approve LAP data for transfer. There are over 4,000 LIDs subject to this review and transfer process; given that number and the need for OPA verification, ED-SFA is not comfortable reducing that timeframe. Following the two-week conversion, LAP will be made available again.
188	Due to time, programming issues and implementation demands we request that when the "Final Redesign Document" is released by the Department of Education it will have no further revisions. We would rather take the time to complete our homework and testing with the Department of Education and then have them issue the final rule in a completed document.	Timeframe	All documents included in this version of the Road Map are considered final.
189	We would like to suggest that the implementation date for this project be based on the date the "Final Redesign Document" is released to the industry plus 2 future quarters to insure sufficient time for programming to be completed by all reporting agencies. Example: Final document released in March 2002 and the first 799 submitted via the new system design would be for September 2002, in October 2002.	Timeframe	The Lender/Servicer Community will have five months of development time between distribution of the final version of the Road Map documents on January 30 and the availability of LaRS for the first submission on July 1. SFA will implement LaRS for the quarter ending June 30th. If a Lender or Servicer is unable to modify their systems to be able to submit electronically within that timeframe, there will be a paper-based submission process available as an interim solution.
190	The timeline is reasonable from our point of view	Timeframe	No change necessary.
191	We will need to modify internal systems to consolidate information and present it in an electronic format?	Timeframe	It is possible that Lenders and Servicers may need to modify their internal systems; ED-SFA is not certain what the various Lender/Servicer systems may be doing now. For Lenders or Servicers who plan to use the web screens to submit LaRS data, few changes, if any, should be necessary. For Lenders or Servicers who plan to use the file transfer process, we would anticipate that your internal systems would need to be modified to produce a file in the correct format for the transfer.
192	Estimated short period of time between final version of LARS File Transfer Record Layout and date of first submission. Currently only a draft version exists. This may be hard to comply with the implementation date.	Timeframe	The Lender/Servicer Community will have five months of development time between distribution of the final version of the Road Map documents on January 30 and the availability of LaRS for the first submission on July 1. SFA will implement LaRS for the quarter ending June 30th. If a Lender or Servicer is unable to modify their systems to be able to submit electronically within that timeframe, there will be a paper-based submission process available as an interim solution.
193	Need to better understand the who will be signing what and why.	Timeframe	A packet containing the Organization Participation Agreement and FMS System Access Security Forms will be sent to the community along with detail instructions on how to complete the forms.
194	Getting the lenders on board with the new processes will require a real 'hands on' effort from the servicers and this will take time.	Timeframe	The first submissions utilizing LaRS will begin in July and can occur throughout the entire quarter.
Trustee Relationship			
195	I have a comment on the section LAP/LARS file transfer crosswalk. [Lender A] is a lender with a trustee relationship. We plan to have our servicers file LARS forms for us. Who needs to be the contact? Is there anywhere that a contact name and phone number could be placed for lender, servicer, and trustee if all apply?	Trustee Relationship	The LAP will now capture trustee information, in addition to lender and servicer data. The OPA will also capture trustee relationships. Any combination of Lender, Servicer or Trustee can serve as the contact.